

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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KESTON CHARLES,

Plaintiff,

DEFENDANTS'
PROPOSED SPECIAL
INTERROGATORIES

-against-

14 CV 259 (PKC)

JONATHAN RIVERA and KEVIN FRANCO

,

Defendants.

-----X

Defendants Jonathan Rivera and Kevin Franco, by their attorney ZACHARY W. CARTER, Corporation Counsel of the City of New York, pursuant to Rule 49 of the Federal Rules of Civil Procedure, hereby submit the following Proposed Special Interrogatories:

1. Did Sergeant Rivera reasonably believe, even if mistaken, that plaintiff turned towards him with a gun in his hand immediately before the first volley of shots?

Yes_____ No_____

2. Did Sergeant Rivera reasonably believe, even if mistaken, that plaintiff turned towards him with a gun in his hand immediately before the second volley of shots?

Yes_____ No_____

3. Did Sergeant Rivera reasonably believe, even if mistaken, that plaintiff turned towards him with a gun in his hand immediately before the third volley of shots?

Yes_____ No_____

3. Did Sergeant Rivera shoot plaintiff after he dropped the gun and surrendered?

Yes_____ No_____

Dated: New York, New York
June 11, 2017

ZACHARY W. CARTER
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New York
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By: /s/

Elissa B. Jacobs
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